



KAUFMAN BORGEEST & RYAN LLP

120 BROADWAY, NEW YORK, NY 10271
TEL: 212.980.9600 FAX: 212.980.9291 WWW.KBRLAW.COM

July 27, 2020

LAURA B. JUFFA
DIRECT: 646.367.6716
LJUFFA@KBRLAW.COM**VIA ECF**Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New YorkRe: *Mohamed Farghaly v. Potamkin Cadillac-Buick-Chevrolet-Geo, Ltd., et al.*
S.D.N.Y. Civil Action No.: 18-CV-11106 (AJN)

Dear Judge Nathan:

We represent the Defendants in the above referenced matter. The Parties are scheduled to complete expert discovery by July 29, 2020. The Parties' Joint Pre-Trial Report is currently due on August 10, 2020. There is a Settlement Conference scheduled before Judge Moses on August 11, 2020. This matter is currently scheduled to begin trial on January 19, 2021. We write jointly with Plaintiff's counsel to request a sixty (60) day extension of the deadline to file the Joint Pre-Trial Report until October 12, 2010.

SO
ORDERED.

The reason for the request is due, in part, to the fact that the Parties have met with some delay in coordinating a date for the depositions of Plaintiff's experts due to the timeline of Defendant's experts review of Plaintiff's expert materials and Plaintiff's expert availability for deposition in light of patient treatment schedules. With the Court's approval of an extension, the Parties anticipate that those depositions will be completed by September 3, 2020.¹

SO ORDERED. 7/28/20

Alison J. Nathan, U.S.D.J.

¹ The Parties are simultaneously filing a joint request to Judge Moses for an extension of the expert discovery deadline from July 29, 2020 to September 3, 2020.

The extension of the Pre-Trial Report submission deadline will not impact the future Settlement Conference or Trial dates.

Respectfully submitted,

KAUFMAN BORGEEEST & RYAN LLP



Laura B. Juffa

cc: (via ECF)

Ishan Dave, Esq.
THE DEREK SMITH LAW GROUP
Attorneys for Plaintiff